

# EXHIBIT B



**CAMPBELL  
& WILLIAMS**  
ATTORNEYS AT LAW

February 23, 2024

***Via Electronic Mail Only***

Kevin E. Rayhill  
Joseph Saveri Law Firm  
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San Francisco, California 94108  
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**Re: *Le et al. v. Zuffa, LLC*, Case No. 15-cv-01045-RFB-BNW**

Dear Mr. Rayhill,

We are in receipt of your February 13, 2024 correspondence regarding trial subpoenas. Please be advised that our firm has been authorized to accept service on behalf of Messrs. Fertitta, White, Mersch, Mulkey, Hendrick, Shelby, Quinn and Hertig. Please note, we understand certain of these witnesses have pre-existing travel plans and/or other commitments around or during the scheduled trial dates. We are seeking more information on these issues and will report back, but reserve the right to seek appropriate relief if the parties and witnesses are unable to reach mutually agreeable resolutions on those matters.

Moving on, we further note you included numerous individuals on your subpoena list who are beyond the subpoena power for this trial. We understand that the following individuals are outside the subpoena power:

- Joseph Silva<sup>1</sup>
- Michael Pine
- Brent Richard
- Scott Coker
- Louis J. DiBella
- Drew Goldman
- Leon Margules
- Colin Neville
- Kurt Otto
- Andrew Simon

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<sup>1</sup> We are still evaluating whether Mr. Silva will agree to appear at trial voluntarily.

Mr. Kevin E. Rayhill

February 23, 2024

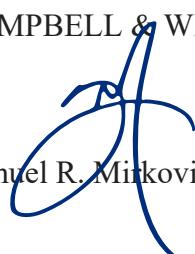
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If you disagree about the geographical location of any of these individuals, or otherwise dispute that they are outside the subpoena power for this trial, please let me know as soon as possible. To the extent Plaintiffs seek to compel individuals to attend through improper subpoenas, Zuffa reserves the right to move to quash those subpoenas.

Finally, to avoid any doubt, please note that all witness testimony will be subject to Zuffa's deposition objections, exhibit objections, motions *in limine*, other pre-trial and trial motions and argument, and any contemporaneous objections at the time of trial.

Sincerely yours,

CAMPBELL & WILLIAMS

  
Samuel R. Mirkovich, Esq.